

### REMARKS

Claims 1 and 2 are amended. Claims 6-8, 11-12, 15-16, and 19-20 are canceled without prejudice or disclaimer. Claim 4-5, 9-10, 13-14, and 17-18 were previously canceled without prejudice or disclaimer. No new matter is added by these amendments. Claims 1-3 are pending. By amending and canceling the claims, applicant is not conceding that the claims are non-statutory under 35 U.S.C. 101, 102, 103, and 112 and is not conceding that the claims are unpatentable over the art cited by the Examiner, as the claim amendments and cancellations are only for the purpose of facilitating expeditious prosecution. Applicant respectfully reserves the right to pursue the subject matter of the claims as is existed prior to any amendment or cancellation and to pursue other claims in one or more continuation and/or divisional applications. Applicant respectfully requests reconsideration and allowance of all claims in view of the amendments above and the remarks that follow.

#### Rejections under 35 U.S.C. 103

Claims 1-2, 6-7, 11, 15-16, and 19 are rejected under 35 U.S.C. 103(a) as unpatentable over Hamilton (US Patent Number 6,889,227) in view of Maritzen (US Patent Number 5,899,990).

Claim 1 recites: "receiving a specification of a method in a container-managed persistence entity bean and a procedure in a backend data store," which is not taught or suggested by Hamilton and Maritzen for the reasons argued below.

In contrast to claim 1, Hamilton at column 4, lines 6-14 describes that Hamilton "receives the database protocol commands or queries from the client computer system," converts "the database protocol commands to general computer programming language commands of applications running on the application server," and executes the "converted protocol commands ... on the application server to access the database." Thus, Hamilton does not teach or suggest "receiving a specification of a method in a container-managed persistence entity bean and a procedure in a backend data store," as

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recited in claim 1 because Hamilton converts to its “general computer programming language commands” while claim 1 receives “a specification of ... a procedure” from a deployer.

In contrast to claim 1, Maritzen at Fig. 2, element 212 transmits a “model state” to the database server and at Fig. 4 sends a “SQL Query” from the Java GUI 106 to the new\_sybserver 302, which does not teach or suggest “a specification of a method in a container-managed persistence entity bean and a procedure in a backend data store,” as recited in claim 1.

Claim 1 further recites: “a container generates access calls to the backend data store, and wherein the container-managed persistence entity bean does not include the calls to the backend data store, wherein the container marks transaction boundaries, wherein the container includes the container-managed persistence entity bean,” which is not taught or suggested by Hamilton and Maritzen for the reasons argued below.

In contrast to claim 1, Hamilton at column 4, lines 13-14 recites that “the converted commands are executed on the application server to access the database,” so the converted commands include whatever calls to the database that they need to access the database, which contradicts and teaches away from “the container-managed persistence entity bean does not include the calls to the backend data store,” as recited in claim 1.

In contrast to claim 1, Maritzen at column 9, lines 6-7 recites: “the run() method 310 submits the SQL query to the selected method in step 434,” which teaches away from “a container generates access calls to the backend data store ..., wherein the container includes the container-managed persistence entity bean,” as recited in claim 1 because the Maritzen “run() method 310” does not include the Maritzen “SQL query;” instead, the Maritzen “run() method 310” is separate from the Maritzen “SQL query,” as can be seen in Maritzen at Fig. 3, element 310, and Fig. 4, elements 402, 410, 420, and 436.

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Claim 1 further recites: "in response to the receiving, generating code in a helper class associated with the container-managed persistence entity bean, wherein the helper class determines a connector based on a connection factory type, wherein the deployer supplies the connection factory type; accessing the procedure in the backend data store via a backend-specific protocol and the connector, wherein the accessing the procedure in the backend data store further comprises invoking the procedure in the backend data store, wherein the code in the helper class performs the accessing and the invoking, and wherein the code in the helper class calls an evaluator class and passes results of the procedure," which is not taught or suggested by Hamilton and Maritzen for the reasons argued below.

In contrast to claim 1, Hamilton executes its "converted commands" "on the application server to access the database," as previously argued above, so Hamilton has no purpose or use for a helper class that determines a connector, performs the accessing the procedure in the backend data store and performs the invoking the procedure in the backend data store, as recited in claim 1.

In contrast to claim 1, Maritzen executes its "SQL query," as explained by Maritzen at column 9, lines 8-10, so Maritzen has no purpose or use for a helper class that determines a connector, performs the accessing the procedure in the backend data store and performs the invoking the procedure in the backend data store, as recited in claim 1.

Claim 2 is dependent on claim 1 and is patentable over Hamilton and Maritzen for the reasons argued above.

Claims 3, 8, 12, and 20 are rejected under 35 U.S.C. 103(a) as unpatentable over Hamilton in view of Maritzen and Apte (US 6,269,373). Applicant respectfully submits that the claims are patentable over Hamilton, Maritzen, and Apte because Hamilton, Maritzen, and Apte, do not teach or suggest all of the elements of the claims, for the reasons argued below.

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Claim 3 depends on claim 1 and is patentable over Hamilton and Maritzen for the reasons argued above. Apte at column 17, lines 17-20 describes a "'Tie' object that maps server application state to corresponding back-end data." But, Apte does not teach or suggest "receiving a specification of a method in a container-managed persistence entity bean and a procedure in a backend data store," as recited in claim 1. Apte also does not teach or suggest "in response to the receiving, generating code in a helper class associated with the container-managed persistence entity bean, wherein the helper class determines a connector based on a connection factory type, wherein the deployer supplies the connection factory type; accessing the procedure in the backend data store via a backend-specific protocol and the connector, wherein the accessing the procedure in the backend data store further comprises invoking the procedure in the backend data store, wherein the code in the helper class performs the accessing and the invoking, and wherein the code in the helper class calls an evaluator class and passes results of the procedure," as recited in claim 1.

Claims 6-8, 11-12, 15-16, and 19-20 are cancelled without prejudice or disclaimer, so the rejections are moot.

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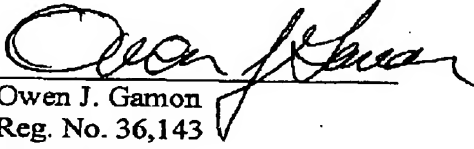
Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is requested. The Examiner is invited to telephone applicant's attorney (651-645-7135) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 09-0465.

Respectfully submitted,

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